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Attorneys for Defendants, Mullooly, Jeffrey, Rooney &
Flynn, LLP, and John J. Sheerin, Esq.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UZ C. KHWEYE,	:	
	:	Civil Action No. 10-4264 (FSH)
Plaintiff,	:	
	:	
v.	:	
	:	
MULLOOLY, JEFFREY, ROONEY &	:	<u>STATEMENT CONCERNING</u>
FLYNN, LLP and JOHN J. SHEERIN,	:	<u>REMOVAL</u>
ESQ.,	:	
	:	
Defendants.	:	
	:	
	:	

Now come Defendants Mullooly, Jeffrey, Rooney & Flynn LLP and John J. Sheerin, Esq. (“Defendants”) and provide the following Statement Concerning Removal, pursuant to this Court’s September 14, 2010, Order:

1. All Defendants joined in the notice of removal.
2. The notice of removal was dated less than thirty days after Defendants were served. Defendants received service of the Complaint on July 20, 2010. Defendants filed the notice of removal on August 19, 2010.
3. Defendant Mullooly, Jeffrey, Rooney & Flynn, LLP are not citizens of the State of New Jersey

4. Defendant Mullooly, Jeffrey, Rooney & Flynn, LLP is a New York limited liability partnership and defendant John J. Sheerin, Esq. is a resident of the State of New York. Plaintiff Uz C. Khweye is a New Jersey resident.

5. Plaintiff alleges that Defendants made misrepresentations and violated the Fair Debt Collection Practices Act in connection with their debt collection practices. In addition to other relief, Plaintiff seeks class certification and money damages pursuant to the Fair Debt Collection Practices Act and other applicable statutes, together with a demand for the attorneys fees, costs, consequential damages, punitive damages and pre-judgment and post-judgment interest, thereby exceeding \$75,000.

6. Plaintiff's Complaint purports to set forth a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 *et seq.* This Court has original jurisdiction over Plaintiff's cause of action based on 15 U.S.C. § 1692k(d).

Respectfully submitted,

s/ Loren L. Speziale
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